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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

19

LT GAME (CANADA) LIMITED and
 LT GAME LIMITED,

20 Plaintiffs,
 21 vs.

22 SCIENTIFIC GAMES CORPORATION,

23 Defendant.

24 Case No.: 2:17-cv-01015 JAD-CWH

25 **MOTION TO EXTEND TIME TO FILE
 26 PRO HAC VICE APPLICATION OF
 27 NON-RESIDENT ATTORNEY DARIUSH
 28 KEYHANI**

29 **(First Request)**

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31 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Local Rule IA 6-1 and 11-
 32 2, plaintiffs LT Game (Canada) Limited (“LT Game Canada”) and LT Game Limited (“LT Game”)
 33 (collectively, “Plaintiff”) hereby requests an order granting additional time for non-resident
 34 attorney Dariush Keyhani, Esq. to file his Designation of Local Counsel and Verified Petition
 35 (“Verified Petition”) in the above-captioned matter and asks the Court for an additional 60 days
 36 within which to file the application.

37

38 This Motion is based upon the below Memorandum of Points and Authorities, the
 39 pleadings and papers on file herein and any arguments of counsel that may be considered at the
 40 hearing on this Motion by the Court.



MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTS

On April 7, 2017, Plaintiff, through its Nevada counsel, filed a Complaint in this matter [ECF No. 1]. Plaintiff included on the caption Mr. Keyhani's name as well, both out of respect to Mr. Keyhani and in anticipation of his likely eventual appearance in the matter. While Mr. Keyhani has never actually appeared, the inclusion of his name on the Complaint triggered the court's 45-day deadline to submit a designation of local counsel. [ECF No. 4]. Pursuant to the Notice to Counsel Pursuant to Local Rule IA 11-2, Mr. Keyhani's Verified Petition is due on May 25, 2017. *Id.*

Plaintiff now moves for a 60-day extension of the time to file Mr. Keyhani's Verified Petition, and, respectfully, Plaintiff seeks this extension for good cause. Specifically, Plaintiff seeks this extension because Plaintiff and defendant Scientific Games Corporation ("Scientific Games") are engaging in settlement discussions and it appears that a settlement of their dispute is imminent, rendering Mr. Keyhani's appearance in this matter unnecessary. Accordingly, Plaintiff respectfully requests this court extend the deadline to submit the Verified Petition by 60 days, up to and including **July 24, 2017**.

II. LEGAL ARGUMENT

An attorney seeking admission pro hac vice must associate with local counsel and apply for admission “within 45 days of his or her first appearance.” *See LR IA 11-2(e).* A party seeking to extend the time with which to comply with the requirements of LR IA 11-2 must file a motion “stat[ing] the reasons for the extension requested and...inform[ing] the court of all previous extensions of” time to comply with LR IA 11-2 the court has granted. *See LR IA 6-1.* Here, there are two reasons for the Court to grant this extension.

First, Mr. Keyhani has never appeared in this matter. While Plaintiff's Nevada counsel included Mr. Keyhani's name on the Complaint out of respect, Mr. Keyhani has not signed or filed anything in this matter, nor has he entered an appearance in court. In addition, Plaintiff and Scientific Games are presently engaged in settlement discussions of their dispute and believe that settlement is highly likely in the immediate future. If Plaintiff is successful in settling this matter

1 without further litigation, Mr. Keyhani's Verified Petition will be unnecessary. Thus, Plaintiff
2 seeks this extension in order to save resources and the court clerk's time.

3 Accordingly, Plaintiff therefore requests this court extend the deadline for Plaintiff and
4 Mr. Keyhani to comply with the requirements of LR IA 11-2 for 60 days [**from May 25, 2017 to**
5 **July 24, 2017**] to allow Plaintiff the time to negotiate a settlement of this matter and determine
6 whether such admission will be necessary.

7 **III. CONCLUSION**

8 For the foregoing reasons, Plaintiff respectfully requests a 60-day extension of time for
9 non-resident attorney Dariush Keyhani to submit his Verified Petition.

10 DATED this 25th day of May, 2017.

11 McDONALD CARANO LLP

12 By: /s/ Amanda C. Yen

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27 *LT Game Limited*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 25th day of May, 2017, a true and correct copy of the foregoing **MOTION TO EXTEND TIME TO FILE PRO HAC VICE APPLICATION OF NON-RESIDENT ATTORNEY DARIUSH KEYHANI** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Jelena Jovanovic
An employee of McDonald Carano LLP



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